

State Water Resources Control Board

September 7, 2018

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7017 2680 0000 6289 4787

Ms. Laurie Murata
Building Manager
Phillip Burton Federal Building and
United States Courthouse
450 Golden Gate Avenue
San Francisco, California 94012
laurie.murata@gsa.gov

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT PHILLIP BURTON FEDERAL BUILDING & UNITED STATES
COURTHOUSE, 450 GOLDEN GATE AVENUE, SAN FRANCISCO**

Dear Ms. Murata:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on August 30, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit Onsite – A valid UST operating permit was not available at the time of inspection.	All	August 30, 2018	Ongoing	H&SC 25284(a); 23 CCR 2712(i)
2	Failure to Maintain Facility and Tank Information – In CERS, the facility and tank information needs to be updated to include the correct tank operator and the correct tank manufacturer name.	All	August 30, 2018	Ongoing	23 CCR 2711(a)
3	Failure to Maintain Monitoring Plan – In CERS, the monitoring plan needs to be updated to list “yes” for maintenance records and designated operator training.	All	August 30, 2018	Ongoing	H&SC 25286(a); 23 CCR 2632 (d)(1), 2711(a)(9)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Maintain Plot Plan/Site Map – In CERS, the site map did not identify the location of the underground piping.	All	August 30, 2018	Ongoing	23 CCR 2711(a)(8)
5	Failure to Maintain Release Response Plan – In CERS, the response plan must be updated because it lists a previous employee.	All	August 30, 2018	Ongoing	23 CCR 2632(d)(2)
6	Failure to Monitor Product Piping – The sensor in the piping sump is unable to detect a leak at the earliest opportunity because it is not at the lowest point of the sump on the product piping side.	All	August 30, 2018	Ongoing	23 CCR 2630(d)
7	Failure to Tag Monitoring Equipment – The annular space sensor did not have a tag affixed at the time of inspection.	All	August 30, 2018	Ongoing	23 CCR 2638(f)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Francisco City & County Public Health Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Josh Alexander
Environmental Health Inspector
San Francisco City & County Department of
Public Health
1390 Market Street, Suite 210
San Francisco, California 94102
josh.alexander@sfdph.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Paula Stewart
Program Manager
San Francisco City & County Public
Health Department
paula.stewart@sfdph.org

Mr. Josh Alexander
Environmental Health Inspector
San Francisco City & County Public
Health Department
josh.alexander@sfdph.org

Mr. Tom Ireland
Contract Manager
Enovity, Inc.
tireland@enovity.com

Mr. Mikhail Rubin
Assistant Chief Engineer
Enovity, Inc.
mrubin@enovity.com